

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

=====X 08 CV 1888 (JES)

MARIA TIRADO,

Plaintiffs,

-against-

PLAINTIFFS' RULE
26(A)(1) INITIAL
DISCLOSURE

NORTH JERSEY EXPRESS, INC. and
PATRICK PERSON,

Defendants.

=====X

PLEASE TAKE NOTICE that pursuant to Rule 26(a)(1) of Federal Rules of Civil Procedure, Plaintiffs hereby makes the following initial disclosure upon information and belief:

WITNESSES:

Maria Tirado;

Patrick Person;

Dr. Arden Kaismen;

Dr. Patrick Murphy;

Dr. David Neuman;

Physicians and medical personnel at St. Barnabas Hospital;

Physicians and medical personnel at Socrates Medical Health, P.C.;

Medical providers and personnel at Back in Action Chiropractic, P.C.;

Any medical provider who conducted orthopedic evaluation of Plaintiff;

Any medical provider who conducted neurological evaluation of Plaintiff;

Any medical provider who conducted psychological evaluation of Plaintiff;

Employees of any medical supply company where Plaintiff was provided modalities, in any;

Any and all physicians, medical providers and medical personnel with whom Plaintiff treated for prior knee (bilateral) injuries;

Any and all physicians, medical providers and medical personnel with whom Plaintiff treated for prior knee (bilateral) surgery;

Any and all physicians or medical providers who provided Plaintiff with lumbar steroid injections;

Employees of any pharmacies where Plaintiff had prescriptions filled;

Employees of CNC Acupuncture Health Care, P.C.;

Any other individual with whom Plaintiff received acupuncture treatment;

Any FDNY personnel who examined and/or treated Plaintiff;

Any physical therapist or other therapist with whom Plaintiff treated;

Pedro Mialan;

Any witnesses identified by Plaintiff;

Any witnesses identified by Defendants;

Any individual with whom Plaintiff may have discussed the accident;

Any individual with whom the Defendants may have discussed the accident;

Any police officers who responded to the scene;

Any witnesses identified in the police report;

Employees of North Jersey Express with knowledge of the accident or the vehicle;

Any individual whose name appears in medical records and accident reports;

Plaintiff's family/primary care physician;

Experts retained by Plaintiff;

Experts retained by Defendants;

Individuals to certify medical records as true and complete copy;

Any medical providers who examined Plaintiff on behalf of the no-fault provider; and

Any individual whose names are yet to be revealed through the discovery process and deposition testimony;

DOCUMENTS:

Plaintiff has produced medical records, reports, x-rays, and MRI films in its possession.

Furthermore, plaintiff has provided defendant with authorizations to obtain records not in plaintiff's possession. Please refer to plaintiff's response to production of documents for all records, reports, x-rays, MRI films and authorizations.

DAMAGES:

Please refer to the response given in plaintiff's response to defendants first set of interrogatories, as plaintiff has provided a list of damages claimed.

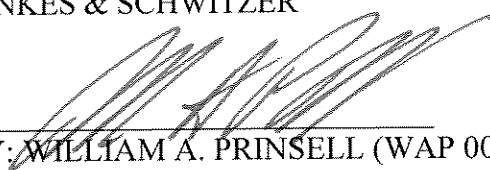
INSURANCE INFORMATION:

Plaintiff refers defendants to review the collateral source authorization provided in plaintiff's response to production of documents. Furthermore, plaintiff received no fault benefits from RLI Insurance Company, claim number 00208290.

Plaintiff reserves the right to supplement these disclosures with additional information as it is discovered, when and if appropriate, up to and through the time of trial.

Dated: New York, New York
June 18, 2008

Yours, etc.,
DINKES & SCHWITZER



BY: WILLIAM A. PRINSELL (WAP 0047)
Attorneys for Plaintiff
112 Madison Avenue
New York, New York 10016
(212) 685-7800

TO: WHITE FLEISCHNER & FINO, LLP
Attorneys for Defendants
61 Broadway, 18th Floor
New York, New York 10006
(212) 487 – 9700
File No.: 394-12991-D-DEH

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: MARIA TIRADO,

and

NORTH JERSEY EXPRESS INC., and
PATRICK PERSON
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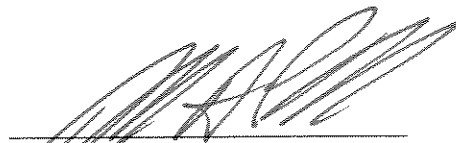
This Document Relates to:

Maria Tirado v. North Jersey
Express Inc., and Patrick
Person,
SDNY 08-CV-1888 (JES)

CERTIFICATE OF PROOF OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing Plaintiff's
Rule 26 (A)(1) Initial Disclosure was served via first class mail on this 26th day of June 2008
on:

WHITE, FLEISCHNER & FINO, LLP
Attorneys for Defendants
140 Broadway – 36th Floor
New York, New York 10005



WILLIAM A. PRINSELL

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PLAINTIFF'S RULE 26 (A)(1)
INITIAL DISCLOSURE

=====X

DINKES & SCHWITZER
Attorneys for Plaintiff
Office and Post Office Address, Telephone
112 Madison Avenue
New York, New York 10016
212-683-3800
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